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Email & Overnight Courier (Fed-Ex)

Mr. Mark Austin, Remedial Project Manager
United States Environmental Protection Agency (EPA)
New Jersey Remediation Branch
Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: American Cyanamid Superfund Site, Operable Unit 8 (OU8) – Impoundments 1 & 2
Statement by Wyeth Holdings, LLC to EPA National Remedy Review Board (NRRB)

Dear Mr. Austin:

On behalf of Wyeth Holdings, LLC (WH), a subsidiary of Pfizer Inc (Pfizer), thank you for this opportunity to submit comments to the USEPA National Remedy Review Board (NRRB) pertaining to selection of the remedy for Operable Unit 8 (OU8, Impoundments 1 & 2). WH is the Respondent to the March 18, 2013 *Administrative Settlement Agreement and Order on Consent for Remedial Design, Operable Unit 4 (OU4) and Focused Feasibility Study, Operable Unit 8 (OU8), USEPA Docket No. CERCLA-02-2012-20 31* (USEPA, 2013) and associated Statement of Work (SOW), referred to hereinafter as the "OU4 RD/OU8 FFS Order". Pfizer acquired Wyeth and its subsidiary Wyeth Holdings Corporation (now known as, WH) in October 2009 and, as a result, acquired responsibility for the property owned by WH and known as the American Cyanamid Superfund Site (Site). Pfizer approached this responsibility in a manner consistent with its long-standing commitment to protecting the environment, the health and safety of the general public and our employees, and the communities in which we operate.

In short, our statement to the NRRB is that all of the remedial alternatives, other than the obligatory baseline "no action" alternative, as presented in the revised draft Focused Feasibility Study (FFS) report (submitted to USEPA on August 8, 2017), are protective of human-health and the environment. That is, these remedial alternatives satisfy the following threshold criteria described under USEPA's Technology and Alternative Evaluation Process:

- Protection of human health and the environment; and
- Attainment of the cleanup objectives (i.e. applicable or relevant and appropriate requirements).

To further distinguish the advantages and disadvantages between the retained remedial alternatives, USEPA also compares each of the remedial alternatives against certain balancing criteria , namely:

- Long-term reliability and effectiveness;
- Reduction of toxicity, volume and mobility;
- Short-term effectiveness;
- Implementability; and
- Costs.

The revised draft FFS report discusses how the balancing criteria are addressed by each alternative and importantly, how Alternatives 3 through 6 provide for the treatment of all materials within OU-8 identified as Principal Threat Waste (PTW).

The analysis provided in the revised draft FFS report indicates that Alternative 3 (In Situ Solidification and Stabilization (ISS), Inner Hydraulic Barrier Wall (HBW), and a Protective Cover) rates the best against the balancing criteria and, therefore, should be given serious consideration by the USEPA and the NRRB. Alternative 3 and Alternative 4 (i.e., Alternative 3 plus the introduction of steam to remove additional contaminant mass while performing ISS), are robust remedial alternatives which treat the PTW in situ, eliminating the need to move or process materials outside of the impoundments.

Alternatives 5 and 6 involve removal of the treated acid tar from Impoundments 1 and 2. Alternative 5 involves ISS treatment, excavation, placement of treated acid tar in the on-Site CAMU, and construction of a protective cover over the remaining OU8 footprint; while Alternative 6 involves excavation, dewatering on-site, transportation of dewatered acid tar to a cement kiln for treatment and disposal, and construction of a protective cover over the remaining OU8 footprint. In our view, Alternative 6 is the better choice of these two alternatives for the reasons described below.

Alternative 5 involves the most on-Site processing steps of the proposed remedial alternatives. This alternative calls for treated acid tar to be placed in the Impoundment 8 Facility, which is located adjacent to a residential community. Furthermore, it is our understanding that the New Jersey Department of Environmental Protection (NJDEP) has opined that more stringent criteria, with significantly lower total benzene concentrations and resultant leachate thresholds be achieved by treatment of the acid tar prior to placement in the CAMU. Should much more stringent treatment criteria be required, WH would then consider Alternative 5 to no longer be the same remedial alternative as proposed in the revised draft FFS report. Further, much more stringent criteria likely could not be achieved through processing the acid tar on-Site. The number of steps involved in acid tar processing, at several locations on the Site, combined with the regulatory

requirements and complex technical apparatus to control air emissions would present significant challenges, without any guarantees that the acid tar processing would achieve lower constituent-specific criteria to allow placement of that treated acid tar in the on-Site CAMU.

When compared to Alternative 5, Alternative 6 is a much more straight-forward approach for on-Site processing to prepare the acid tar for off-Site transport and treatment. Alternative 6 relies on smaller-scale excavation and on-Site dewatering of acid tar with off-Site transport of dewatered acid tar in specialized truck transport containers to licensed off-Site cement kilns. These cement kilns would be permitted to treat the acid tar while utilizing the high-BTU value of the material for energy recovery and subsequent beneficial reuse as a fuel to operate their machinery to make cement. Use of treated acid tar as a supplemental fuel would offset the use of coal, oil, or other energy sources. This Alternative delivers a two-for-one benefit (i.e., treat PTW from a Superfund site and a fuel source to manufacture cement), thus lessening the overall carbon footprint.

In closing, WH considers all remedial alternatives, as presented in the revised draft FFS report (i.e., Alternatives 3 through 6), to be protective of human-health and the environment and attain cleanup goals. Alternative 3 ranks the highest among the balancing criteria for the in-situ treatment alternatives that do not require relocating treated acid tar while Alternative 6 would rank the next highest among the same criteria for relocating acid tar for subsequent ex situ treatment.

Very truly yours,

Russell G. Downey

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